



# THE INTEGRITY MANAGER: A JOB PROFILE

**More and more organizations decide to appoint an integrity manager. The call for this is also increasing. But to what job profile does this function need to adhere? In this overview you can read all about the *do's and don'ts* when appointing an integrity manager.**

## WHY AN INTEGRITY MANAGER?

Appointing an integrity manager makes it clear that the top of the organization is serious about integrity. It leads to an improvement of integrity within the organization, because an integrity manager has the time and knowledge to develop adequate integrity policies. This gives integrity a permanent place on the organizational agenda. The integrity manager also fulfills an important coordinating role and thus ensures coherence between the various integrity instruments and actors.

---

Appointing an integrity manager makes it clear that the top of the organization is serious about integrity

---

Depending on the size of the organization, several internal integrity managers can be appointed. Smaller organizations can seek advice from an external integrity manager. Or join forces with other organizations by jointly appointing an integrity manager. Industry and umbrella organizations have a facilitating role in this.

## WHAT'S IN THIS OVERVIEW?

The 'Integrity manager job profile' offers employers tips on how to draw up a job profile for integrity managers. It can also be used to evaluate existing profiles. The precise job description for the integrity manager differs per organization and sector. The job titles may also differ, examples of various titles are: integrity coordinator, integrity officer, *integrity manager* or *ethics officer*.

In the overview we first outline a brief background of the integrity manager. Then we consider the preconditions for the job and job combinations that are better avoided. Finally, the most important job tasks, requirements and competences are listed.

This job profile builds on the Integrity Management Survey & the integrity manager of the Dutch Whistleblowers' Authority.<sup>1</sup> For the job profile, use has been made of various example profiles as applied in practice. The most important common aspects agreements have been selected and summarized from this. A number of publications on the role of the integrity manager were also used to draw up the job profile.

## 1. BACKGROUND OF THE INTEGRITY MANAGER

Over time, more and more integrity measures for organizations have been added, such as: reporting procedures, tender procedures, confidential advisers, codes of conduct, screening. But also integrity workshops, integrity investigations, risk analyses, dilemma training or regulations in the field of privacy, ancillary activities, gifts, job rotation, segregation of duties, disciplinary and enforcement procedures. There is also a growing awareness that the effectiveness of integrity measures increases as the cohesion improves. That is why it is increasingly recommended to appoint an integrity manager.

Integrity management is pre-eminently a multidisciplinary subject. In most organizations, various departments and officers play a role in the development and implementation of integrity policy. Think, for example, of Compliance, HR, audit, finance, legal affairs, (information) security, facility affairs, purchasing and communication. But also to the Works Council, managers and the (internal or external) confidential adviser.

---

Integrity management is pre-eminently a multidisciplinary subject. In most organizations, various departments and officers play a role in the development and implementation of integrity policy.

---

The integrity manager should therefore not be seen as a 'lone wolf' or as the conscience of the organization. After all, he or she does not replace the tasks and responsibilities of (top) management, supervisors or other functionaries in that area. The integrity manager is pre-eminently an initiator and connector, who creates support for integrity within the organization and who coordinates, professionalizes and monitors the care for the integrity policies.

By appointing an integrity manager, the top of the organization makes it clear that it attaches great importance to integrity within the organization. When the integrity

<sup>1</sup> [https://www.huisvoorklokkenluiders.nl/Publicaties/publicaties/2022/05/02/dwa\\_integrity-management-and-the-integrity-manager](https://www.huisvoorklokkenluiders.nl/Publicaties/publicaties/2022/05/02/dwa_integrity-management-and-the-integrity-manager)

manager leaves the position, there must be a vacancy to appoint a new integrity manager. Moreover, an integrity manager contributes to the quality of the integrity policies because he really has the time and expertise for this. This appointment may therefore not be non-committal or temporary. It is a permanent position that requires a clear positioning within the organization.

## 2. THE PRECONDITIONS

What is required to be able to properly fulfill the position of integrity manager? A brief summary of the most important preconditions:

- Management support for the subject of integrity and for the integrity manager.
- An independent position of the integrity manager and a clear mandate.
- Direct reporting line to senior management ( e.g. Executive Board/SB, SG).
- Sufficient time and resources, including a designated budget.
- Clear job description and delineation of tasks and responsibilities.
- Good contact with the other integrity actors, the spokesperson's department and external parties such as supervisors.

## 3. COMBINATION WITH OTHER ROLES WITHIN THE ORGANIZATION

The 'Survey on Integrity Management & the Integrity Manager' of the Dutch Whistleblowers' Authority shows that 75% of integrity managers combine their assignment with other tasks.

Certainly in smaller organizations it is understandable that the position of an integrity manager is not full-time. However, in view of the special nature of the integrity manager's activities, a number of job combinations are problematic. For a good job performance, the integrity manager should have an independent position.

---

Considering the special nature of the integrity manager's activities, a number of job combinations are problematic

---

### ***Combination with confidential counselor***

The integrity manager does not also fulfill the role of *confidential counsellor*.<sup>2</sup> After all, the integrity manager is primarily focused on the organization and advises the leadership and management of the organizations on setting up and improving the integrity policy.

<sup>2</sup> <https://www.huisvoorklokkenluiders.nl/Publicaties/publicaties/2019/03/08/integrity-in-practice---the-confidential-integrity-adviser>

The confidential counsellor assists employees who call on him and provides advice on (internal) reporting of integrity violations or other abuses and undesirable behaviour. Because of the integrity manager's independent position and to avoid the appearance of partiality, this combination of functions is not recommended. It is important, however, that the integrity manager is aware of the trends the confidential counsellor notices in issues raised by employees. In this way, the integrity manager can use this knowledge to adjust and improve the integrity policy. The integrity manager can also formulate *best practices* and thus strive to prevent the repetition of integrity violations.

### ***Combination with the investigation of integrity violations***

The integrity manager also does not take on the role of *someone who investigates internal reports*, or of a *company lawyer* or *HR advisor* involved in the imposition of sanctions. Investigating integrity violations relates to incidents that are preferably carried out by (internal or external) specialists in the field of (forensic) audits. In some organizations the integrity manager does carry out a limited preliminary investigation (triage) at the request of the management. If this is the case, the integrity manager must have the required knowledge and experience. Determining and imposing legally founded, fair and proportionate sanctions is subsequently a matter for the company lawyer, together with the HR advisor and management.

The integrity manager can be consulted in both processes, but his role is ideally from a distance. In addition, it is important that the integrity manager is kept informed of the findings of the integrity investigations, because this can be used as input for improving the integrity measures.

### ***Combination with managerial positions***

Is it wise to combine the function of integrity manager with the role of *board member*, member of *management*, or *manager*? That too can be problematic, because they are primarily responsible for the integrity and integrity policy of the units that fall under them.

It is the duty of the integrity manager to advise and question other managers objectively, critically and independently about the implementation of the integrity policy. The integrity manager cannot do that for his own unit. It is also questionable whether he can advise his direct colleague supervisors sufficiently freely, whether he is sufficiently trusted by employees because of his dual role and whether as a manager he has sufficient time for his duties as integrity manager. Of course, the integrity manager can be the manager of an integrity department.

### ***Integrity officer as internal reporting point***

Finally, the question of whether it is desirable to have the integrity manager act as a *reporting point* for integrity violations and abuses. Organizations with at least 50 employees are obliged to provide an internal reporting procedure for reports of social abuses. Preferably, this procedure (because of the one-stop shop) is also amenable to reports and questions about integrity issues and undesirable behaviour.

In practice, employees will approach the integrity manager with integrity questions and reports. This has the advantage that the integrity manager hears what is going on in the organization and what concerns exist among employees. On the basis of the information provided, the integrity manager can already make an initial assessment of the seriousness of the case and whether it concerns an integrity violation or another abuse. The integrity manager can refer the reporter in the correct manner (such as the confidential adviser, managers and the reporting center) or carry out a preliminary investigation at the request of the management. After all, it is important to prevent the integrity manager from taking over the responsibilities of the manager, the confidential advisor or a formal reporting centre.

## **4. JOB PROFILE IN TRIPLICATE: TASKS, REQUIREMENTS AND COMPETENCIES**

### ***Tasks***

The integrity manager plays an important role in the process of developing, implementing, supporting, coordinating, monitoring and continuing the integrity policy and framework of the organization. The specific tasks of the integrity manager may differ per sector and per organization, but in a more general sense, these include:

- making an inventory of legal frameworks and/or sectoral principles that are relevant to the integrity policy of the organization;
- mapping the specific (future) integrity risks and issues of the organization that are relevant to the integrity policy;
- align the integrity policy with the mission, the (core) tasks and the processes of the organization;
- developing, implementing, disseminating, monitoring and updating the integrity policy;
- continuously putting the theme of integrity on the agenda and stimulating integrity development within the organization;
- supporting and providing solicited and unsolicited advice to management in the implementation and improvement of the integrity policy;
- supporting employees in putting (the) integrity (policy) into practice - for example by organizing workshops and training courses;
- coordinating the various aspects of the integrity policy and ensuring regular coordination between the internal actors who have a responsibility therein;
- bringing together knowledge and expertise in the field of integrity promotion;
- periodically monitoring, evaluating and adjusting the integrity policy pursued

- translating developments inside and outside the organization into the integrity policy;
- reporting to management (for example via annual report or progress report) on the implementation of the integrity policy;
- collaborating with external parties (umbrella organization, consultative bodies, etc.);
- creating integrity awareness in the organization, for example through communication and awareness campaigns.;
- both proactively and in case of incidents;
- supporting employees in framing and clarifying problems and finding the right reporting channels.

### **Requirements**

- Academic work and thinking level.
- Minimum 5 years work experience.
- Experience with project work.
- Completed integrity management course (or willing to take such a course).
- Demonstrated affinity with integrity policy.
- Knowledge and experience with integrity issues.
- Knowledge of the relevant laws and regulations and willing to keep it up to date.
- As part of the position, a proof of good conduct and references must be provided.

### **Competencies**

- Reliable and discreet.
- Accessible and visible in the organization.
- Analytical and context sensitive Think, for example, of Compliance, HR, audit, finance, legal affairs, (information) security, facility affairs, purchasing and communication. But also to the Works Council, managers and the (internal or external) confidential adviser.
- Proactive, persuasive and solution-oriented.
- Patient, authoritative and tenacious.
- Organized and planned.
- Independent thinker and good presenter.
- Firm and critical interlocutor.
- Networker, connector and booster.

This is a publication of the Dutch Whistleblowers' Authority. The Whistleblowers' Authority has compiled this document with the utmost care. But it may contain inaccuracies and omissions. Therefore, you cannot derive any rights from this information. The Dutch Whistleblowers' Authority accepts no liability for damage resulting from the use of the information contained in this document.

© Huis voor Klokkeluiders, 2023.  
[www.huisvoorklokkeluiders.nl](http://www.huisvoorklokkeluiders.nl)